

1 Diane de Seve (SBN 169941)



2 Nolan, Armstrong
3 & Barton, LLP

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5 Tel. (650) 326-2980 Fax (650) 326-9704

6 Attorney for Defendant
7 Ernst Rohde

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,)	NO. CR 07-70419 RS
)	
11 Plaintiff,)	DECLARATION OF COUNSEL IN
)	SUPPORT OF UNOPPOSED TRAVEL
12 v.)	REQUEST
)	
13)	
)	
14 ERNST JOHN ROHDE,)	
)	
15 Defendant.)	
_____)	

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18 I, Diane de Seve, hereby declare:

19 1. I am an attorney licensed to practice law before the courts of the State of
20 California and the Northern District of California, and an associate with Nolan, Armstrong &
21 Barton, LLP, counsel of record for defendant Ernst Rohde.

22 2. Mr. Rohde is charged by Criminal Complaint with two counts of 18 U.S.C. §
23 2252(a)(2). He is currently permitted to travel throughout the State of California and is
24 monitored by GPS through Pretrial Services.

25 3. Mr. Rohde requests permission to make a six-day trip to Las Vegas, Nevada from
26 November 9, 2007 to November 15, 2007 with his wife and mother and father-in-law, who will
27 be visiting Mr. and Mrs. Rohde from the east coast.

28 4. He plans to depart on November 9, 2007 and drive to Las Vegas returning on

1 November 15, 2007. He will be staying at Bally's Las Vegas located at 3645 Las Vegas Blvd.
2 South, Las Vegas, NV 89109. The telephone number is (877)-603-4390.


3 5. On October 12, 2007, I spoke with Anthony Granados from Pretrial Services (408-
4 535-5223) and he had no objection to permitting Mr. Rohde to travel to Las Vegas.

5 6. On October 12, 2007, I spoke with Assistant United States Attorney Thomas
6 O'Connell (408-535-5053) and he stated that he had no objection to Mr. Rohde's travel request.

7 7. Mr. Rohde has complied with all conditions of his pre-trial release and is in good
8 standing with pretrial services.

9 8. For the above stated reasons, it is respectfully requested that Mr. Rohde be permitted
10 to travel as indicated above.

11
12 I declare under penalty of perjury that the foregoing is true and correct except for those
13 matters stated on information and belief and as to those matters I am informed and believe them
14 to be true. Executed this 12 day of October, 2007 at Palo Alto, California.

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17 Diane de Seve
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